

1 PAUL T. TRIMMER
2 Nevada Bar No. 9291
3 LYNNE K. MCCHRYSTAL
4 Nevada Bar No. 14739
5 **JACKSON LEWIS P.C.**
6 300 South Fourth Street, Suite 900
7 Las Vegas, Nevada 89101
8 Telephone: (702) 921-2460
9 Email: paul.trimmer@jacksonlewis.com
10 lynne.mcchrystal@jacksonlewis.com

11 *Attorneys for Defendant*
12 *Williams Charles Construction*
13 *Company*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 LANCE D. STUCKEY, JR., individually and on
17 behalf of all other similarly situated,

18 Plaintiffs,

19 vs.

20 APEX MATERIALS, LLC, ELKHORN
21 ENVIRONMENTAL, LLC, WERDCO BC,
22 INC., WERDO LLC, BRENT CONRAD,
23 BRANDON CONRAD, PATRICIA CONRAD,
24 LAS VEGAS PAVING CORPORATION, TAB
25 CONTRACTORS, INC., WILLIAM CHARLES
CONSTRUCTION COMPANY, HARBER
COMPANY, INC., John Does I to XX, name
fictitious true name and number of persons being
unknown, and XYZ Corporations I to XX, name
fictitious true name or number of entities being
unknown,

26 Defendants.

27 Case No. 2:22-cv-01964-APG-EJY

28 **STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S
COMPLAINT
(FIRST REQUEST)**

29 IT IS HEREBY STIPULATED by and between Plaintiff Lance D. Stuckey, Jr. ("Plaintiff"),
30 through his counsel Leon Greenberg Professional Corporation, and Defendant William Charles
31 Construction Company ("Defendant"), through its counsel Jackson Lewis P.C., that Defendant shall
32 have an extension up to and including April 14, 2023, in which to file a response to Plaintiff's
33 Complaint. This Stipulation is submitted and based upon the following:
34

1 1. Defendant was served with the Complaint and summons on or around January 12,
2 2023. Defendant does not contest that service was effective.

3 2. Defendant's response to the Complaint was due on or around February 2, 2023.

4 3. Counsel for Defendant has been in communication with Plaintiff's counsel regarding
5 a potential resolution amongst the several named defendants.

6 4. Accordingly, the parties agreed to extend Defendant's deadline to file an Answer
7 from February 2, 2023, to April 14, 2023.

8 5. This is the first request for an extension of time for Defendant to file a response to
9 Plaintiff's Complaint.

10 6. This request is made in good faith and not for the purpose of delay.

11 Nothing in this Stipulation, nor the fact of entering to the same, shall have the effect of or
12 be construed as waiving any claim or defense held by any party hereto.

13 Dated this 7th day of March, 2023.

14 LEON GREENBERG PROFESSIONAL JACKSON LEWIS P.C.
15 CORPORATION

16 /s/ Leon Greenberg
17 LEON GREENBERG, ESQ.
RUTHANN DEVEREAUX-GONZALEZ, ESQ.
18 1811 S. Rainbow Blvd., Suite 210
Las Vegas, NV 89146

19 *Attorneys for Plaintiff*
20 *Lance D. Stuckey, Jr.*

16 /s/ Lynne K. McChrystal
17 Paul T. Trimmer
Lynne K. McChrystal
300 S. Fourth Street, Suite 900
18 Las Vegas, Nevada 89101

19 *Attorneys for Defendant*
20 *William Charles Construction Company*

21 **ORDER**

22 IT IS SO ORDERED:

23 
24 ~~United States District Court Judge /~~
25 United States Magistrate Judge

26 Dated: 3-9-2023